

EXHIBIT B

In the Matter Of:

FORD vs

VETERANS GUARDIAN VA CLAIM CONSULTING

MELANIE JOHNSON

December 18, 2024



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<p>26</p> <p>1 I think over the -- over the video, it might help her</p> <p>2 differentiate between similar sounding words.</p> <p>3 I may still have permissions to access</p> <p>4 the file, but I have not accessed it in several</p> <p>5 years.</p> <p>6 MR. BROCHU: Did you get that, Miss</p> <p>7 Marta?</p> <p>8 THE COURT REPORTER: Yes, sir. Thank</p> <p>9 you so much.</p> <p>10 MR. BROCHU: All right. Thank you,</p> <p>11 Ms. Johnson.</p> <p>12 Q. (By Mr. Brochu) So even though you -- you</p> <p>13 haven't accessed it in years, you likely would still</p> <p>14 be able to access it if you have some question about</p> <p>15 a veteran that Veterans Guardian entered into an</p> <p>16 agreement with at that time period?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. And it's safe to say that, you know,</p> <p>19 God forbid, you didn't have access to that, someone</p> <p>20 at Veterans Guardian does, right?</p> <p>21 A. (Inaudible.)</p> <p>22 Q. And that time, I couldn't -- I couldn't</p> <p>23 hear you. Go ahead. One more -- one more time?</p> <p>24 A. Correct.</p> <p>25 Q. Okay.</p>	<p>1 A. I do.</p> <p>2 Q. Okay. And -- and that spreadsheet that</p> <p>3 goes from the inception date until summer of 2021,</p> <p>4 how many of those tens of thousands of veterans would</p> <p>5 be on there, ballpark?</p> <p>6 A. I really couldn't estimate that.</p> <p>7 Q. Do you think that y'all have invoiced</p> <p>8 veterans more in 2017, 2018, 2019? Or in 2022, 2023,</p> <p>9 2024?</p> <p>10 A. Absolutely in the more current years.</p> <p>11 Q. Okay. So from 2022, 2023, 2024, y'all have</p> <p>12 invoiced more veterans than in the, you know,</p> <p>13 earliest years that you were at the company?</p> <p>14 A. Correct.</p> <p>15 Q. And I think what Ms. Kehoe told me is that</p> <p>16 when you -- around the time you and Ms. Kehoe joined,</p> <p>17 there were only about 29 employees at Veterans</p> <p>18 Guardian. Is that -- is that your recollection too?</p> <p>19 MS. WOLVERTON: Objection; form.</p> <p>20 You can answer.</p> <p>21 THE WITNESS: Okay.</p> <p>22 A. To the best of my -- my recollection on</p> <p>23 this, that seems about accurate.</p> <p>24 Q. How many employees do y'all have -- does</p> <p>25 Veterans Guardian have now?</p>
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<p>1 A. Yes.</p> <p>2 Q. Great. And it sounds like -- it sounds</p> <p>3 like that would be -- that would be something that</p> <p>4 would just be one Excel spreadsheet, and, you know,</p> <p>5 pretty easy to produce. Do you agree?</p> <p>6 A. From my understanding, yes.</p> <p>7 Q. How many veterans would be on that Excel</p> <p>8 spreadsheet? How many names and -- and, you know,</p> <p>9 names, and all that information that we just talked</p> <p>10 about, how many would be listed on there?</p> <p>11 A. I really couldn't estimate that.</p> <p>12 Q. No worries. So William Taylor, do you know</p> <p>13 who that is?</p> <p>14 A. I do.</p> <p>15 Q. Who is -- who is that to you, Ms. Johnson?</p> <p>16 A. William Taylor is our -- he's one of the</p> <p>17 owners of the company. One of the founders.</p> <p>18 Q. Okay. And are you familiar with Mr.</p> <p>19 Taylor's testimony before Congress?</p> <p>20 A. I'm aware that he did testify before</p> <p>21 Congress. I -- I have not watched it.</p> <p>22 Q. Okay. Understood. And I'll represent to</p> <p>23 you today that Mr. Taylor, under oath to Congress,</p> <p>24 said that y'all have represented tens of thousands of</p> <p>25 veterans. Do you agree with Mr. Taylor?</p>	<p>1 A. I honestly don't know the exact number.</p> <p>2 Q. Does your department process payroll, Ms.</p> <p>3 Johnson?</p> <p>4 A. No, we do not.</p> <p>5 Q. What department is that?</p> <p>6 A. That would be HR.</p> <p>7 Q. Okay. And does your department process</p> <p>8 sick time or vacation days?</p> <p>9 A. No, we do not.</p> <p>10 Q. Okay. What -- what all does HR do that</p> <p>11 involves those sorts of things that you don't do,</p> <p>12 that the -- that the financing accounting department</p> <p>13 -- department does not do?</p> <p>14 A. Could you clarify what you mean by -- I</p> <p>15 obviously --</p> <p>16 Q. An -- an easier question is, I figured -- I</p> <p>17 figured that, because you're the director of finance,</p> <p>18 that you would also be in charge of every aspect of</p> <p>19 that. So I'm now just trying to get clarification as</p> <p>20 to what falls under your silo, and what falls under</p> <p>21 HR's silo.</p> <p>22 Because I don't know the company like</p> <p>23 you do, so that's why I'm just trying to learn a</p> <p>24 little bit more.</p> <p>25 Okay. So it sounds like people are</p>

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1 I, Melanie Johnson, do hereby state
2 under oath that I have read the above and
3 foregoing deposition in its entirety and
4 that the same is a full, true and correct
5 transcript of my testimony.

6

7 Signature is subject to corrections on
8 attached errata sheet, if any.

9

10 Melanie Johnson

11

12 State of

13

14 County of

15

16 Sworn to and subscribed before me this
17 day of , 2025.

18

19 Notary Public

20

21 My commission expires:

22

23

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1 NORTH CAROLINA

VANCE COUNTY

2

C E R T I F I C A T E

3 I, Marta J. Charles, Court Reporter and Notary

4 Public, the officer before whom the foregoing Zoom

5 videoconference proceeding was conducted, do hereby

6 certify that the witness whose testimony appears in the

7 foregoing proceeding was duly sworn by me remotely via

8 Zoom videoconference (NC driver license 000025713443);

9 that the transcript is a full, true and complete

10 transcript of said proceedings to the best of my ability

11 to discern comments via Zoom transmission and thereafter

12 transcribed under my supervision; and that the foregoing

13 pages, inclusive, constitute a true and accurate

14 transcription of the testimony of the witness.

15 I do further certify that I am neither counsel for,

16 related to, nor employed by any of the parties to this

17 action in which this proceeding was conducted, and

18 further, that I am not a relative or employee of any

19 attorney or counsel employed by the parties thereof, nor

20 financially or otherwise interested in the outcome of

21 the action.

22 This the 2nd day of January, 2025.

23

Marta J. Charles

24 Marta J. Charles, Court Reporter and Notary Public

25

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